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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

AUG 1 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

By Electronic Submission

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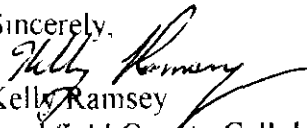
Re E911 Interim Report for Tier III Carriers  
CC Docket No. 94-102  
Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon

Dear Ms. Dortch:

Pursuant to the Commission's *Order to Stay*, in the above referenced docket,<sup>1</sup> Litchfield County Cellular, Inc., d/b/a Ramcell of Oregon ("LCC") hereby submits its E911 Interim Report for Tier III carriers. This Report provides the Commission with the current status of LCC's E911 efforts and its progress towards compliance with the Commission's E911 Phase II benchmarks.

Please contact the undersigned if you should have any questions regarding this Report.

Sincerely,

  
Kelly Ramsey  
Litchfield County Cellular, Inc.  
d/b/a Ramcell of Oregon  
(606) 878-6000

<sup>1</sup> Revision of the Commission's Rules to ensure Compatibility with Enhanced 911 Emergency Calling Systems: Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, CC Docket No. 94-102, Notice of Inquiry, FCC 02-210, 17 FCC Rcd 14,841 (2002).

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## **INTERIM REPORT FOR TIER III CARRIERS**

### **LITCHFIELD COUNTY CELLULAR, INC. D/B/A RAMCELL OF OREGON Block B licensee of Oregon 5 – Coos RSA**

Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon (“LCC”) hereby provides the Commission with its E911 Interim Report (“Report”) for Tier III carriers. As a Tier III carrier, LCC is submitting this one-time Report in order to provide the Commission with the current status of its E911 efforts and its progress towards compliance with the Commission’s Phase II benchmarks. LCC is the cellular licensee on the Block B portion of the Oregon 5 – Coos RSA (call sign KNKN393). In preparing the instant Report, LCC has followed the guidelines provided by the Commission in its June 30, 2003 Public Notice.<sup>1</sup>

LCC understands the importance of E911 and its obligation as a licensee to assist in ensuring that E911 connectivity for Phase I and Phase II service is properly implemented. LCC is using the services of Telecommunications Service Incorporated (“TSI”) to assist it with its E911 implementation. TSI is a third party vendor with years of experience in assisting wireless carriers, such as LCC, in their E911 implementation efforts by providing both project management and implementation services. TSI has played a key role in LCC’s E911 implementation process, coordinating the implementation process and assisting LCC with technical problems as they arose. TSI, with the participation of the relevant Public Switched Safety Points (“PSAPs”) and Local Exchange Carriers (“LECs”), developed an implementation process by which each party was assigned implementation tasks with mutually agreed upon deadlines. To ensure that the parties were all involved and kept current, TSI hosts bi-weekly conference calls with all the parties to discuss developments and gauge progress.

#### **The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):**

LCC has one Phase I PSAP request, dated October 19, 1999, from the Oregon Emergency Management, Department of State Police. This PSAP request was intended, however, to cover all the PSAPs in the State of Oregon. LCC has not received any Phase II requests from any PSAPs within its licensed service area. There are seven (7) PSAPS throughout the OR-5 RSA. The seven PSAPS are: Douglas County Sheriff’s Office; Douglas County, Myrtle Creek Police Department, Coos County Sheriff’s Office; Coos County 9-1-1 Center, Coos Bay Police Department, Josephine County 9-1-1 Center; Curry County Sheriff’s Office, and; Curry County 9-1-1 Center, Brookings Police Department. Of these seven, the following four PSAP centers are the answering points for 9-1-1 calls within their counties: Josephine County 9-1-1 Center, Coos County 9-1-1 Center; Curry County 9-1-1 Communications, and; Douglas County Sheriff’s Office. These four centers will be the answering points for their counties and will transfer calls

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<sup>1</sup> See Public Notice, Wireless Telecommunications Bureau Provides Further Guidance On Interim Report Filings by Small Sized Carriers, DA 03-2113, tel June 30, 2003

for the small PSAPs in Brookings (Brookings Police Dept), Coos Bay (Coos Bay Police Dept ) and Myrtle Creek (Myrtle Creek Police Dept)

TSI and LCC are working with the PSAPs in LCC's service area to ensure reliable E911 Phase I service. TSI and the PSAPs are conducting regularly scheduled meetings to discuss implementation milestones and the work that needed to be done to achieve these milestones. Specifically, TSI sent out surveys and information requests to the PSAPs and the LEC in order to ascertain the various elements and components of E911 Phase I that LCC would need to implement. This information was deemed essential for LCC to begin implementation efforts and to establish the requisite implementation schedule.

Originally, TSI had requested that the PSAPs return their surveys to TSI by March 18, 2003. With the exception of the Coos Bay Police Department, all the PSAPs returned their surveys in late April 2003. Moreover, TSI requested that the Josephine County 9-1-1 Communications Center PSAP ("Josephine PSAP") and the Douglas County Sheriff's Office PSAP return their updated Master Street Address Guides ("MSAG") by March 2003.<sup>2</sup> The MSAG is a critical document as it provides information regarding where emergency rescue efforts should be sent. The Josephine PSAP only recently provided its MSAG update on July 3, 2003 and Douglas County Sheriff's Office has yet to respond to this request for information. Continued delays by the PSAPs in returning the requested information have contributed in a significant manner to the delays associated with LCC's ability to provide E911 Phase I service because without this most basic information, such as the number of trunks from the selective router to the PSAP or the location of the ALI database, LCC is unable to proceed with implementation.

Similar surveys were also sent to the two LECs that provide service in the Oregon 5 RSA, Verizon and Qwest. TSI requested that the LECs return their surveys to TSI by December 13, 2002. While Verizon was timely in completing its survey, Qwest did not return all of its information until April 16, 2003. TSI, and thus LCC, cannot plan for E911 Phase I implementation without the "complete picture." Delays on one end have led to further delays in the process.

Additionally, delays in LCC's ability to respond to the Phase I requests also stem from the delays associated with LCC's negotiations for its interconnection agreements with Verizon and Qwest. All parties have been vigorously working towards completing these Agreements and it is anticipated that they will be completed in the immediate future. Once these Agreements are finalized, LCC will be able to order the necessary circuits it will need for E911 Phase I implementation. In anticipation that all continues to go well, LCC believes that it will be ready to go to live users before the end of the year.

There is one other factor contributing to LCC's inability to currently meet the E911 Phase I requests – funding. In order to be able to provide E911 Phase I service

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<sup>2</sup> The remaining five PSAPs are located in territory served by Verizon. Verizon and LCC are in the final stages of negotiating a 911 addendum to their Interconnection Agreement. Once this Addendum is finalized, TSI will send Verizon the MSAG update requests covering the PSAPs in Verizon's area.

through its switch, LCC will need to purchase and install two new features to its Lucent 5E switch – FAF 343 and 464. The cost of acquiring these two features is \$236,000 – a significant expense for a small rural carrier. LCC has worked tirelessly these past two years in trying to “keep up” with all the Commission’s regulatory mandates for wireless carriers’ LNP, TTY, CALEA as well as E911. Each of these mandated programs has required LCC to upgrade of an existing component of LCC’s switch or a purchase new components which would otherwise would either not have been purchased or would not have been purchased for quite some time. And each one comes at a price – a price that is sometimes too high for small carriers to absorb. LCC was recently compelled to request an extension of an underlying waiver request of the Commission’s requirement to support roaming of pooled and ported numbers because it has been unable to obtain the necessary financing to fund the needed upgrades.<sup>3</sup> While LCC anticipates that this funding will be finalized by the end of August, LCC will have to find additional funds to meet E911 mandates.

TSI has kept all seven PSAPs up to date on the status of LCC’s efforts through TSI’s bi-weekly conference calls. Through these efforts a cooperative partnership between the PSAPs and Ramcell has been forged. The PSAPs are comfortable with the progress made by LCC and have continued to provide LCC with the needed flexibility to meet their Phase I requests.<sup>4</sup> LCC will continue to work closely with the LECs to work towards the provision of E911 Phase I service. In anticipation that all continues to go well, LCC believes that it will be ready to go to live users before the end of the year.

**The carrier’s specific technology choice (i.e., network-based or handset-based solutions, as well as the type of technology used):**

As previously reported to the Commission, LCC will be utilizing a handset-based location technology solution for Phase II E911. LCC has begun implementing this choice by ordering the requisite ALI-capable handsets. LCC will begin selling these handsets by the September 1, 2003 deadline if not sooner. The problems experienced by LCC in ordering and obtaining these phones is two-fold. First is the supply-demand problem – there is too much demand for the ALI-capable handsets but still not enough supply to meet this demand. Particularly, as a Tier III carrier, there is even a more limited supply of ALI-capable handsets available for LCC to order. Manufacturers fill the orders of the larger carriers before turning to the mid-sized and smaller carriers. In some instances, these larger carriers can account for the majority of the handset supply available from a particular manufacturer. Thus, Tier III carriers can be left to scrounge for the ALI-capable cellular handsets they need. Complicating matters is the fact that given LCC’s relative size and the limited amount of handsets it requires, LCC cannot even work

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<sup>3</sup> See Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon, Progress Report for Petition for Limited Waiver and Extension of Time, CC Docket 99-200 (June 13, 2003).

<sup>4</sup> The FCC’s rules as well as a recent FCC decision make it clear that the PSAPs and the carrier may jointly agree to alternate timeframes than those delineated in the FCC’s rules. See, 47 C.F.R. § 20.18(j)(5). See also, *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Petition of City of Richardson, Texas, CC Docket No. 94-102, Order on Reconsideration, 17 FCC Rcd 24282, 24282 (2002).

directly with the manufacturers to order the handsets and must go through third party vendors

The second problem is the current cost of ALI-capable handsets. At present, ALI-capable handsets will cost LCC \$100 more per phone than similarly configured non-ALI capable handsets currently offered by LCC to its customers. Currently, LCC has not perceived demand by its customers for such an equipped phone, as Phase II service is not being provided in LCC's service area. Thus in order to entice its customers to purchase the phone, LCC will need to subsidize the costs of the phones, an expense that, in addition to the other E911 related costs, will disproportionately impact a small carrier such as LCC.

**Status on ordering and/or installing necessary network equipment.**

As LCC has not received any requests for Phase II E911 service, it has not begun to order the network equipment that will be needed to implement Phase II E911 service. As outlined above, LCC is working towards completion of its interconnection agreements with the Verizon and Qwest and upon obtaining the necessary financing for the needed switch components. Once these tasks are completed, LCC will be close to successfully implementing Phase I E911 service throughout its service area. LCC anticipates completing this implementation by the end of the year. TSI and LCC will turn to implementation of E911 Phase II service upon completion of Phase I service. LCC will begin working on its Phase II E911 implementation with TSI despite there being no E911 Phase II service request from any of the PSAPs covering its area.

LCC currently anticipates two possible problems in ordering and installing the necessary equipment. The first one is endemic to all Tier III carrier, whether the requisite equipment will be in sufficient supply. Because there is such a large demand for the necessary equipment to become Phase II compliant, small Tier III carriers such as LCC are forced to wait until there is enough supply for it to receive the needed equipment. The second issue is the question of whether LCC will have sufficient capital to purchase the equipment. As there are no Phase II requests and LCC does not foresee such a request in the near future, LCC cannot judge at this time whether either or both of these issues will prove to be significant.

**If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:**

As noted above, LCC is pursuing a handset-based solution. While such handsets are available to large carriers, they are only available on a limited basis to Tier III carriers such as LCC. Given the fast-approaching September 1, 2003 deadline for selling ALI-capable handsets, many carriers have similarly requested a supply of ALI-capable handsets. From LCC's discussions with its third party vendors, supply is straining to meet the demand. Thus, by the time the orders of the smaller carriers are ready to be

filled, there may not be sufficient ALI-capable phones to completely meet the needs of the Tier III carriers. LCC is currently finalizing agreements to acquire ALI-capable handsets in time to meet the first benchmark of September 1, 2003.

LCC does perceive a problem in marketing ALI-capable handsets to its customers because there is currently no perceived benefit to the subscriber to purchase a phone with capabilities it cannot currently utilize. Phase II E911 service has not been requested by the PSAPs in LCC's service area and as such the ALI-capable phones will not be capable of being used to their full potential. LCC believes it will be hard to market the benefits of an ALI-capable phone if those benefits cannot be utilized by customers. If the prices of ALI-capable handsets do not fall quickly, LCC will be in the untenable position of diverting capital earmarked for new cells and maintenance to underwrite the purchase of Phase II capable handsets which will not, for the foreseeable future, have their Phase II E911 capabilities used.

**The estimated date on which Phase II service will first be available in the carrier's network:**

Without a valid PSAP request for E911 Phase II service, it is difficult for LCC to estimate when such service will be available. Should a PSAP request such service in the near future, however, LCC believes that it will be capable of responding to such a request within the FCC allocated six-month period.

**Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.**

LCC believes that the 95% penetration rate for ALI-capable phones by the December 31, 2005 deadline is achievable if adequate handsets can be obtained and economic issues can be overcome. However, a shortfall of ALI-capable handsets or the possible economic impact of the costs associated with obtaining the number of phones needed to meet the December 31, 2005 benchmark could stymie LCC's best efforts to meet the benchmark dates. LCC will provide the Commission with additional updates if any hurdles appear which could endanger its ability to meet the benchmark deadlines.

### DECLARATION OF JILL RAMSEY

I, Jill Ramsey, am an officer of Litchfield County Cellular, Inc. d/b/a/ Ramcell of Oregon, and I hereby certify that, to the best of my knowledge and belief, the information contained on this form and the attached document is complete and accurate

Signed.

Jill Ramsey

Date

11-31-03